

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

TIMOTHY JACKSON,

Plaintiff,

v.

LAURA WRIGHT, et al.,

Defendants.

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Civil Action No. 4:21-cv-00033-ALM

JURY

**DEFENDANTS' UNOPPOSED MOTION
TO WITHDRAW AND SUBSTITUTE COUNSEL**

TO THE HONORABLE U.S. DISTRICT JUDGE AMOS L. MAZZANT:

Defendants¹ file this Unopposed Motion to Withdraw and Substitute Counsel, respectfully showing the Court as follows:

Assistant Attorney General Mary B. Quimby is currently co-counselor for Defendants. Good cause exists for Ms. Quimby's withdrawal from representing Defendants, as Ms. Quimby has accepted employment outside the Texas Office of the Attorney General.

This case has been administratively reassigned to Assistant Attorney General John Ramsey, to serve as co-counsel for Defendants. Mr. Ramsey's contact information is contained in the signature block below. Assistant Attorney General William Farrell will remain as Lead

¹ Defendants include the following: Laura Wright, Milton B. Lee, Melisa Denis, Mary Denny (deceased), Daniel Feehan, A.K. Mago, Carlos Munguia, and G. Brint Ryan, all in their official capacities as members of the Board of Regents for the University of North Texas System ("Board Defendants"); and Rachel Gain, Ellen Bakulina, Andrew Chung, Diego Cubero, Steven Friedson, Rebecca Dowd Geoffroy-Schwinden, Benjamin Graf, Frank Heidelberger, Bernardo Illari, Justin Lavacek, Peter Mondelli, Margaret Notley, April L. Prince, Cathy Ragland, Gillian Robertson, Hendrik Schulze, Vivek Virani, and Brian F. Wright ("Individual Defendants").

Attorney for Defendants. Counsel for Defendants has communicated with counsel for Plaintiff regarding the requested withdrawal and substitution, and Plaintiff is unopposed.

For the foregoing reasons, Defendants respectfully request that Ms. Quimby be permitted to withdraw as counsel for Defendants in this matter, and that Mr. Ramsey be substituted as the new co-counsel representing Defendants.

Respectfully submitted.

KEN PAXTON

Attorney General of Texas

BRENT WEBSTER

First Assistant Attorney General

RALPH MOLINA

Deputy First Assistant Attorney General

AUSTIN KINGHORN

Deputy Attorney General for Civil Litigation

KIMBERLY GDULA

Chief, General Litigation Division

/s/ Mary B. Quimby

WILLIAM FARRELL

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Counsel for Defendants

CERTIFICATE OF CONFERENCE

Pursuant to Local Rule CV-7(i), I hereby certify I have complied with the meet and confer requirement in Local Rule CV-7(h). Specifically, I certify that on February 19, 2025, I communicated with Michael Allen, counsel for Plaintiff, regarding the relief requested in this motion, and Mr. Allen informed me that Plaintiff is unopposed.

/s/ Mary B. Quimby

MARY B. QUIMBY

Assistant Attorney General

CERTIFICATE OF SERVICE

I hereby certify that on February 20, 2025, a true and correct copy of this document was electronically filed using the Court's CM/ECF system, which will send notification of such filing to the following counsel of record:

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Counsel for Plaintiff

/s/ Mary B. Quimby

MARY B. QUIMBY

Assistant Attorney General